

EXHIBIT 21

Deposition of Roger Blair Excerpts

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

ROGER D. BLAIR, Ph.D., VOL. II

Orlando, Florida

December 9, 2017

7:59 a.m.

Reported By:
Dawn A. Hillier, RMR, CRR, CLR
Job No. 52574

ROGER D. BLAIR, Ph.D., VOL. II - HIGHLY CONFIDENTIAL

<p style="text-align: right;">300</p> <p>1 MR. SILVERMAN: I'm sorry. Right. Right. 2 Let me try it again. 3 BY MR. SILVERMAN: 4 Q A Strikeforce fighter who's fought for 5 Strikeforce. Strikeforce was purchased by Zuffa. The 6 fighter then left Strikeforce and then came back and 7 fought for the UFC, would you include them in the 182? 8 A So, he didn't fight for Strikeforce when 9 Strikeforce was owned by UFC? 10 Q They did. 11 MR. WIDNELL: But not for UFC. 12 MR. SILVERMAN: But not for UFC. 13 MR. WIDNELL: That's your question? 14 MR. SILVERMAN: Yes. 15 THE WITNESS: No, I don't believe so. 16 BY MR. SILVERMAN: 17 Q Okay. What about a fighter who fought for 18 Pride and had a Pride contract, then Pride was bought by 19 Zuffa, and that fighter fought for the UFC under their 20 Pride contract, left the UFC, and then returned to the 21 UFC, would you include that fighter in the 182? 22 A If he fought for UFC, and then left, and then 23 came back, yes. 24 Q It doesn't matter what contract the fighter 25 was on, in other words?</p>	<p style="text-align: right;">302</p> <p>1 Q Okay. So, if we're trying to evaluate the 2 marginal revenue product of MMA fighters, if an MMA 3 promotion -- if the input is hiring two additional 4 fighters to fight in a single event featuring one bout 5 between the two fighters -- 6 A Okay. Can I stop you? 7 Q Sure. 8 A I mean -- 9 Q Yeah. 10 A I think you misspoke. 11 Q Okay. 12 A Because you're talking about -- I think you 13 were talking about an input hiring something. 14 Q Yep. 15 A Well, the inputs don't do the hiring. The 16 employee does the hiring. So -- 17 Q Yeah. Sorry. Let me -- 18 A -- I have a problem with the question. 19 Q Sure. Let me try again. 20 If a MMA promoter is -- hires two additional 21 fighters for the purpose of fighting in a single event 22 featuring one bout between those two fighters, and that 23 event brings in a million dollars in additional revenue 24 to that promoter, isn't the marginal revenue product of 25 those two fighters \$1 million?</p>
<p style="text-align: right;">301</p> <p>1 A Yes. That's correct. 2 Q Of these 182 fighters you identify, have you 3 investigated how many of them the UFC wanted to retain? 4 A You mean when they left the first time? 5 Q That's right. 6 A They obviously wanted them back or they 7 wouldn't have signed them; right? 8 Q Yeah. But have you investigated how many the 9 UFC wanted to retain when they left? 10 A No. 11 Q So, in paragraph 40 of your report, you write 12 [as read]: The marginal revenue product is equal to the 13 change in total revenue on sales in the output market 14 resulting from an increase or a decrease in the purchase 15 of the input by one unit. 16 Is that right? 17 MR. WIDNELL: I'm sorry. Where in the 18 paragraph? 19 MR. SILVERMAN: Paragraph 40. Am I wrong? 20 MR. WIDNELL: Well, you might be in the right 21 one. I just didn't pick up -- halfway through, the 22 marginal revenue product? 23 MR. SILVERMAN: Yeah. Exactly. Yep. 24 THE WITNESS: Yes, that's correct. 25 BY MR. SILVERMAN:</p>	<p style="text-align: right;">303</p> <p>1 MR. WIDNELL: Objection, form. 2 THE WITNESS: So, the -- the initial situation 3 is that revenue's zero. And we're putting on, you 4 know, one event. 5 And the -- the increase in the -- there's an 6 increase in revenue which of course is equal to 7 what the total revenue is for that event because 8 the base was zero. 9 And then, so the question is, you know, 10 whether the marginal revenue product for those -- 11 you know, for those two fighters combined is -- you 12 know, is the -- is that total revenue. 13 You know, the -- the problem with thinking 14 about it like that is that, you know, you have to 15 produce the event. That requires a venue and it 16 requires lots of other inputs. And, you know, if 17 you remove the venue -- you remove the fighters, 18 the revenue's zero. Remove the venue, the 19 revenue's zero. 20 So, you have to take into account, you know, 21 all of the other inputs that go into generating 22 this fan revenue. 23 BY MR. SILVERMAN: 24 Q If you can measure the marginal revenue 25 product of athletes in a sport and you knew the total</p>

ROGER D. BLAIR, Ph.D., VOL. II - HIGHLY CONFIDENTIAL

<p style="text-align: right;">304</p> <p>1 revenue, then you could calculate a ratio of the 2 marginal revenue product of the athletes to the total 3 revenue in that sport; right? 4 MR. WIDNELL: Objection, form. 5 THE WITNESS: That's a matter of -- I mean, 6 you're -- you're asking me if -- if I have a -- if 7 I know what the numerator and the denominator are, 8 I can do the arithmetic, and the answer's yes. 9 BY MR. SILVERMAN: 10 Q For any given sport, the revenue from an event 11 can, in theory, be broken down into the revenue product 12 of the various input factors that went into producing 13 that event; right? So, in the example you just talked 14 about, the fighters in the venue, for example. 15 MR. WIDNELL: Objection, form, misstates. 16 THE WITNESS: Okay. So, I'm sorry. You're 17 asking me if -- if we have all of the -- if we have 18 all of the inputs and we -- you know, we list all 19 of those, can we attribute shares of the total 20 revenue that are accounted for by each of those 21 inputs? 22 BY MR. SILVERMAN: 23 Q Right. 24 A Is that your question? 25 Q In theory.</p>	<p style="text-align: right;">306</p> <p>1 cost, their prices, you know, once I know what 2 those quantities are, you know, the total output, 3 if you will, is determined by the -- the nature of 4 the production function. And then that determines 5 the quantity. And given the demand conditions, 6 that will then determine what the -- you know, what 7 the price is. And you can calculate the -- the 8 total revenue from that. And what you have to 9 subtract out, then, in order to determine the 10 profit, is the payments to the inputs that went 11 into producing that output. 12 Now, can you then attribute -- can you say how 13 much of the revenue was generated by each of the 14 inputs. You know, that becomes complicated because 15 the marginal revenue products are -- the marginal 16 product -- marginal revenue product of one input is 17 influenced by the quantities of the other inputs 18 that are employed. So, you know -- and, you know, 19 you -- it's relatively easy to see that, you know, 20 in, you know, you know, specific production 21 examples. 22 BY MR. SILVERMAN: 23 Q If we look at Major League Baseball, for 24 example, do you think that the players are responsible 25 or that the -- strike that.</p>
<p style="text-align: right;">305</p> <p>1 A Well, you know, I mean, again, not 2 necessarily. And, you know -- and, you know, in the 3 same sense that, you know, if you were to say, you know, 4 we have the athletes that are providing the sports 5 entertainment and we have the venue, so we have -- let's 6 just suppose there's only those two inputs. We have the 7 athletic input, and the venue. You know, revenue's zero 8 if either one of those things is zero. So, having put 9 on the event, you know, allocating the -- the revenue -- 10 a portion of the revenue to each of them would be, you 11 know, pretty difficult. 12 Q But in theory, isn't the revenue -- by 13 definition, doesn't it -- isn't it attributable to all 14 of the factors that go into production, even if it's 15 difficult to apportion it properly? 16 MR. WIDNELL: Objection, form. 17 THE WITNESS: Okay. So -- okay. So, you 18 know, in theory, you know, what you're looking at 19 is, you know, the -- you know, the profit, let's 20 say, is a function of the revenue which is driven 21 by the -- you know, the demand on the part of 22 consumers, you know, the fans, and the -- and the 23 output, which is driven by the inputs; okay? 24 So, if I know what all of the inputs are, you 25 know, the quantities of all the inputs, and their</p>	<p style="text-align: right;">307</p> <p>1 If we look at Major League Baseball, for 2 example, do you think that the marginal revenue product 3 of the players accounts for the vast majority of the 4 revenue generated? 5 MR. WIDNELL: Objection, form. 6 THE WITNESS: Well, certainly if you're a 7 baseball fan, you're not going to want to go to the 8 stadium and just sort of sit around and look at the 9 green grass. You know, you're going to want -- 10 you're going to go there because the players are 11 going to play a game. And you want to watch the 12 athletic competition on the field. You know, so, 13 you know, the -- you know, but that attribution, 14 you know, again, you know, is complicated by the 15 fact that, you know, if you didn't have the 16 stadium, you know, you wouldn't generate the same, 17 you know, fan appeal. 18 There wouldn't be any place for them to watch 19 the game. So, you know, the size of the stadium 20 can come into play and, you know, because that's 21 another input in the production of revenues through 22 providing sports entertainment. 23 BY MR. SILVERMAN: 24 Q What are the other major factors of production 25 besides the stadium, I think you mentioned, that play an</p>